

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

LORENZO MYERS
Defendant

15-CR-10145-RGS

**MEMORANDUM IN OPPOSITION TO GOVERNMENT’S
MOTION FOR DETENTION**

Lorenzo Myers, the defendant, by his counsel, submits this memorandum in opposition to the government’s motion for pretrial detention.

According to discovery provided by the government to date, it appears that Mr. Myers’s alleged role in this alleged 15-person conspiracy was extremely limited. There is nothing in the government’s evidence or allegations to demonstrate that Mr. Myers presents a serious flight risk or poses a danger to the community.

In fact, Mr. Myers, who is 28 years old, is a lifelong Boston resident. He is engaged to his fiancée, Lakeema Rochelle, with whom he is expecting a baby due in October 2015, and he is the father of two sons.

Mr. Myers has enrolled in an adult learning program in order to obtain his GED certificate, and has plans to work in construction. He has completed training in carpentry, building maintenance and painting, landscaping and OSHA.

Mr. Myers requests that he be released on the least restrictive conditions that will ensure his attendance at court and compliance with the terms of his release from custody.

He suggests that terms of release that include his residing with Ms. Rochelle, and his being subject to a curfew and GPS monitoring, would provide the necessary assurance.

Respectfully submitted,

Lorenzo Myers,

By his attorney,

/s/ Stephen J. Weymouth

Stephen J. Weymouth

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing motion has been filed through the ECF system, and will be sent electronically to the individuals named on the Notice of Electronic Filing generated in connection herewith on July 8, 2015.

/s/ Stephen J. Weymouth

Stephen J. Weymouth